

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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NAACP,

Plaintiff,

-against-

99 Civ 3999 (JBW)

99 Civ 7037 (JBW)

AMERICAN ARMS, et al.

ACUSPORT CORP., et al.

Defendants.

NOTICE TO TAKE DEPOSITION

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PLEASE TAKE NOTICE that plaintiff will take the deposition upon oral examination before a notary public or duly authorized officer, stenographically and by video tape, of James Dorr, Esq. on February 24, 2003 and continuing thereafter until completed at the office of plaintiff's attorney, 111 Broadway, New York New York 10006, pursuant to Rule 30(b)(6) of the Federal Rules of Civil Procedure.

PLEASE TAKE FURTHER NOTICE that pursuant to Rules 30 and 34 deponent is to produce before this deposition and bring to the deposition all documents listed in the annexed rider.

Dated: New York, New York
February 5, 2003

Yours, etc.

MONICA CONNELL (MC-9841)
Attorney for Plaintiff
Office and P.O. Address
111 Broadway, 4th Floor
New York, New York 10006
(212) 693-2330
Fax: (212) 693-2334

RIDER TO DEPOSITION NOTICE

All documents and materials listed below which are in the possession, custody or control of the deponent are to be produced both before and at the deponent's deposition:

1. All memoranda, correspondence, charts, notes, studies, analyses, speeches, recordings, documents, and videotapes made at, relating to, reflecting, mentioning, referencing or pertaining to meetings between industry members, such as representatives of handgun manufacturers, dealers, distributors and trade organizations, and in house and outside counsel in relation to voluntary steps that could be taken by the industry to lessen the flow of guns into criminal and juvenile hands.

2. All memoranda, correspondence, charts, notes, studies, analyses, speeches, recordings, documents, and videotapes made at, relating to, reflecting, mentioning, referencing or pertaining to "lawyers meetings" between industry members, such as representatives of handgun manufacturers, dealers, distributors and trade organizations, and in house and outside counsel at or around the time of annual SHOT shows or at such other times and places as these meetings took place.

3. All memoranda, correspondence, charts, notes, studies, analyses, speeches, recordings, documents, and videotapes made at, relating to, reflecting, mentioning, referencing or pertaining to meetings between industry members, such as representatives of handgun manufacturers, dealers, distributors and trade organizations, and in house and outside counsel in relation to various legal, legislative and policy issues facing the industry from 1992 to the present.

4. All memoranda, correspondence, charts, notes, studies, analyses, speeches, recordings, documents, and videotapes made at, relating to, reflecting, mentioning, referencing or pertaining to meetings between industry members, such as representatives of handgun manufacturers, dealers, distributors and trade organizations, and in house and outside counsel held at the offices of, at the behest of, or with the assistance of the "Eddie Mahe Company."

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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NAACP,

Plaintiff,

-against-

99 Civ 3999 (JBW)

99 Civ 7037 (JBW)

AMERICAN ARMS, et al.

ACUSPORT CORP., et al.

Defendants.

NOTICE TO TAKE DEPOSITION

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PLEASE TAKE NOTICE that plaintiff will take the deposition upon oral examination before a notary public or duly authorized officer, stenographically and by video tape, of Timothy Bumann, Esq. on February 25, 2003 and continuing thereafter until completed at the office of plaintiff's attorney, 111 Broadway, New York New York 10006, pursuant to Rule 30(b)(6) of the Federal Rules of Civil Procedure.

PLEASE TAKE FURTHER NOTICE that pursuant to Rules 30 and 34 deponent is to produce before this deposition and bring to the deposition all documents listed in the annexed rider.

Dated: New York, New York
February 5, 2003

Yours, etc.

MONICA CONNELL (MC-9841)
Attorney for Plaintiff
Office and P.O. Address
111 Broadway, 4th Floor
New York, New York 10006
(212) 693-2330
Fax: (212) 693-2334

RIDER TO DEPOSITION NOTICE

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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK
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NAACP,

Plaintiff,

-against-

99 Civ 3999 (JBW)
99 Civ 7037 (JBW)

AMERICAN ARMS, et al.
ACUSPORT CORP., et al.
Defendants.

NOTICE TO TAKE DEPOSITION

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PLEASE TAKE NOTICE that plaintiff will take the deposition upon oral examination before a notary public or duly authorized officer, stenographically and by video tape, of Ann Kimball, Esq. on February 26, 2003 and continuing thereafter until completed at the office of plaintiff's attorney, 111 Broadway, New York New York 10006, pursuant to Rule 30(b)(6) of the Federal Rules of Civil Procedure.

PLEASE TAKE FURTHER NOTICE that pursuant to Rules 30 and 34 deponent is to produce before this deposition and bring to the deposition all documents listed in the annexed rider.

Dated: New York, New York
February 5, 2003

Yours, etc.

MONICA CONNELL (MC-9841)
Attorney for Plaintiff
Office and P.O. Address
111 Broadway, 4th Floor
New York, New York 10006
(212) 693-2330
Fax: (212) 693-2334

RIDER TO DEPOSITION NOTICE

All documents and materials listed below which are in the possession, custody or control of the deponent are to be produced both before and at the deponent's deposition:

1. All memoranda, correspondence, charts, notes, studies, analyses, speeches, recordings, documents, and videotapes made at, relating to, reflecting, mentioning, referencing or pertaining to meetings between industry members, such as representatives of handgun manufacturers, dealers, distributors and trade organizations, and in house and outside counsel in relation to voluntary steps that could be taken by the industry to lessen the flow of guns into criminal and juvenile hands.

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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK
-----X
NAACP,

Plaintiff,

-against-

99 Civ 3999 (JBW)

99 Civ 7037 (JBW)

AMERICAN ARMS, et al.
ACUSPORT CORP., et al.
Defendants.

NOTICE TO TAKE DEPOSITION

-----X

PLEASE TAKE NOTICE that plaintiff will take the deposition upon oral examination before a notary public or duly authorized officer, stenographically and by video tape, of Georgia Nichols, Esq. on February 27, 2003 and continuing thereafter until completed at the office of plaintiff's attorney, 111 Broadway, New York New York 10006, pursuant to Rule 30(b)(6) of the Federal Rules of Civil Procedure.

PLEASE TAKE FURTHER NOTICE that pursuant to Rules 30 and 34 deponent is to produce before this deposition and bring to the deposition all documents listed in the annexed rider.

Dated: New York, New York
February 5, 2003

Yours, etc.

MONICA CONNELL (MC-9841)
Attorney for Plaintiff
Office and P.O. Address
111 Broadway, 4th Floor
New York, New York 10006
(212) 693-2330
Fax: (212) 693-2334

RIDER TO DEPOSITION NOTICE

All documents and materials listed below which are in the possession, custody or control of the deponent are to be produced both before and at the deponent's deposition:

1. All memoranda, correspondence, charts, notes, studies, analyses, speeches, recordings, documents, and videotapes made at, relating to, reflecting, mentioning, referencing or pertaining to meetings between industry members, such as representatives of handgun manufacturers, dealers, distributors and trade organizations, and in house and outside counsel in relation to voluntary steps that could be taken by the industry to lessen the flow of guns into criminal and juvenile hands.

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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK
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NAACP,

Plaintiff,

-against-

99 Civ 3999 (JBW)

99 Civ 7037 (JBW)

AMERICAN ARMS, et al.
ACUSPORT CORP., et al.
Defendants.

NOTICE TO TAKE DEPOSITION

-----X

PLEASE TAKE NOTICE that plaintiff will take the deposition upon oral examination before a notary public or duly authorized officer, stenographically and by video tape, of Paul Januzzo, Esq. on February 28, 2003 and continuing thereafter until completed at the office of plaintiff's attorney, 111 Broadway, New York New York 10006, pursuant to Rule 30(b)(6) of the Federal Rules of Civil Procedure.

PLEASE TAKE FURTHER NOTICE that pursuant to Rules 30 and 34 deponent is to produce before this deposition and bring to the deposition all documents listed in the annexed rider.

Dated: New York, New York
February 5, 2003

Yours, etc.

MONICA CONNELL (MC-9841)
Attorney for Plaintiff
Office and P.O. Address
111 Broadway, 4th Floor
New York, New York 10006
(212) 693-2330
Fax: (212) 693-2334

RIDER TO DEPOSITION NOTICE

All documents and materials listed below which are in the possession, custody or control of the deponent are to be produced both before and at the deponent's deposition:

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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

-----X
N.A.A.C.P.,

Plaintiff

-against-

AMERICAN ARMS, et al. and ACUSPORT
CORP., et al.,

Defendants.
-----X

99 Civ. 3999 (JBW)(CLP)
99 Civ. 7037 (JBW)(CLP)

CERTIFICATE OF SERVICE

MONICA CONNELL, an attorney duly licensed to practice law before the Courts of this State and a member of the Bar of this Court affirms under penalties of perjury that on February 5, 2003, I served copies of the foregoing Notices of Deposition upon the witnesses named therein at the following addresses by First Class United States Mail:

Georgia Nichols, Esq.
Renzulli, Piscioti & Renzulli
300 East 42nd Street
New York, New York 10017

Timothy Bumann, Esq.
Budd Larner Rosenbaum Greenberg &
Sade, P.C.
The Chandler Building
127 Peachtree Street, Suite 636
Atlanta, Georgia 30303

James Dorr, Esq.
Wildman Harrold Allen & Dixon
225 West Wacker Drive, Suite 3000
Chicago, Illinois 60606-1229

Anne Kimball, Esq.
Wildman Harrold Allen & Dixon
225 West Wacker Drive, Suite 3000
Chicago, Illinois 60606-1229

Paul Januzzo, Esq.
Glock, Inc.
c/o Renzulli, Piscioti & Renzulli
300 East 42nd Street
New York, New York 10017

I additionally served all defense counsel in this action by electronic notification through the Court's electronic filing system.

Dated: New York, New York
February 5, 2003

Monica Connell